

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEGACY RESTORATION, LLC,	:	
	:	
<i>Plaintiff,</i>	:	
	:	Case No. 1:25-CV-05319
v.	:	
OSWALDO “JUNIOR” BARAJAS,	:	SUPPLEMENTAL
USA CONTRACTING CO, LLC, LEAH	:	DECLARATION OF
RAFFLES, AND BRIAN WOLFF,	:	BRAD HADAMIK
	:	IN SUPPORT OF
<i>Defendants.</i>	:	PLAINTIFF’S MOTION FOR
	:	<u>INJUNCTIVE RELIEF</u>
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Brad Hadamik declares, pursuant to 28 U.S.C. § 28 1746, under penalty of perjury, that the following is true and correct:

1. I am a Managing Director at FTI Consulting Technology, LLC (“FTI”). My CV is attached as **Exhibit A**.
2. I submit this affirmation in support of Plaintiff Legacy Restoration, LLC’s motion for injunctive relief.
3. On June 12, 2025, FTI created a forensic image of a Legacy-issued computer in the possession of Leah Raffles (the “Raffles Computer”). FTI retained the image (the “Original June 12 Image”) and I have the understanding that the Raffles Computer was returned to the possession of Leah Raffles.
4. Attached as **Exhibits B, C, and D** are true and correct copies of communications from the Original June 12 Image of the Raffles Computer.

5. On July 1, 2025, FTI received the Raffles Computer a second time. Attached as **Exhibit E** is the chain of custody form. The serial number of this laptop received on July 1 (Serial No. MHC4NNMQGV) matched the serial number on the laptop received on June 12.

6. At 12:04 PM CDT on July 1, 2025, I opened the laptop screen of the Raffles Laptop, and the machine immediately turned on by itself. The first screen that appeared as soon as it was illuminated was the word “hello” in various languages. This is an indication that the Raffles Computer has been reset and therefore user data, settings, and installed applications have been erased, and the operating system has been restored to a new configuration as if the computer just left the factory.

7. FTI imaged the Raffles Laptop received on July 1, 2025 (the “July 1 Image”) and confirmed that Raffles’ user profile is gone and the laptop has been reset. In looking at *InstallHistory.plist* within June 12 Image, there are 146 entries within it. Every time software is installed via a .pkg installer or the App Store is installed or updated, a record is added to this plist file. The first entry seen in this plist is the Mac Operating System version 14.6.1, which was installed on August 8, 2024. The same *InstallHistory.plist* file in the July 1 Image contains only a single entry. The fact that this plist has been wiped nearly clean is indicative of a device factory reset. The one entry seen is for the installation of Mac Operating System version 14.6.1 (the exact same OS version that was already installed almost a year prior) on June 25, 2025 at 2:41:49 PM (UTC), which converts to 9:41 AM CDT on June 25, 2025.

8. A device factory reset as described above restores a device to its original factory settings, effectively erasing all data and settings.

9. Below are true and correct screen shots from the Original June 12 Image and the July 1 Image, showing the installation of the Mac Operation System version 14.6.1 on August 8,

2024 (with respect to the Original June 12 Image) and June 25, 2025 (with respect to the July 1 Image).

June 12 Image:



```

1  <?xml version="1.0" encoding="UTF-8"?>
2  <!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0
3  <plist version="1.0">
4  <array>
5    <dict>
6      <key>date</key>
7      <date>2024-08-08T19:29:46Z</date>
8      <key>displayName</key>
9      <string>macOS 14.6.1</string>
10     <key>displayVersion</key>
11     <string>14.6.1</string>
12     <key>processName</key>
13     <string>softwareupdated</string>
14   </dict>
15   <dict>
16     <key>contentType</key>
17     <string>config-data</string>
18     <key>date</key>
19     <date>2024-08-08T20:28:04Z</date>
20     <key>displayName</key>
21     <string>XProtectPlistConfigData</string>
22     <key>displayVersion</key>
23     <string>5271</string>
24     <key>packageIdentifiers</key>
25     <array>
26       <string>com.apple.pkg.XProtectPlistConfigData_10_15.16U4326</string>
27     </array>
28     <key>processName</key>
29     <string>softwareupdated</string>
30   </dict>
31 </array>
32 </plist>

```

July 1 Image:



```

1  <?xml version="1.0" encoding="UTF-8"?>
2  <!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">
3  <plist version="1.0">
4  <array>
5    <dict>
6      <key>date</key>
7      <date>2025-06-25T14:41:49Z</date>
8      <key>displayName</key>
9      <string>macOS 14.6.1</string>
10     <key>displayVersion</key>
11     <string>14.6.1</string>
12     <key>processName</key>
13     <string>softwareupdated</string>
14   </dict>
15 </array>
16 </plist>

```

10. Attached as **Exhibit F** is a true and correct copy of an email extracted from the June 12 Image.

I declare under penalty of perjury that the following is true and correct. Executed on this July 7, 2025.

A handwritten signature in blue ink, appearing to read 'B Hadamik', is written over a horizontal line.

Brad Hadamik